

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Daily News, LP; Chicago Tribune Company, LLC; Orlando Sentinel Communications Company, LLC; Sun-Sentinel Company, LLC; San Jose Mercury-News, LLC; DP Media Network, LLC; ORB Publishing, LLC; and Northwest Publications, LLC,,

*Plaintiff,*

v.

MICROSOFT CORP., OPENAI, INC., OPEN AI LP, OPENAI GP, LLC, OPENAI LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORP., LLC, and OPENAI HOLDINGS, LLC,

*Defendants.*

Case No. 1:24-cv-03285-SHS

**DECLARATION OF MARK T. RAWLS  
IN SUPPORT OF MOTION FOR  
ADMISSION *PRO HAC VICE***

---

I, Mark T. Rawls, declare as follows:

1. Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern District of New York, I respectfully submit this Declaration in support of my motion for an Order for admission to practice *pro hac vice*, and to appear as counsel for Daily News, LP; Chicago Tribune Company, LLC; Orlando Sentinel Communications Company, LLC; Sun-Sentinel Company, LLC; San Jose Mercury-News, LLC; DP Media Network, LLC; ORB Publishing, LLC; and Northwest Publications, LLC in the above-captioned action.

2. I am a member in good standing of the bar of the District of Columbia and Commonwealth of Virginia. Attached as Exhibit A is a true and correct copy of the Certificates of my Good Standing from the District of Columbia Court of Appeals and Supreme Court of Virginia.

3. I have never been convicted of a felony, I have never been censured, suspended, disbarred or denied admission or readmission by any court, and there are no disciplinary proceedings presently against me.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2024

Washington, DC

/s/Mark T. Rawls

Mark T. Rawls